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9
10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12 In re

13 RUSSELL G. KOEHNLEIN, JR. AND
14 CHRISTINA M. KOEHNLEIN,

15 Debtor(s).

Bankruptcy Case No. 09-23924-mkn

Chapter 13

GMAC MORTGAGE, LLCs REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS

16
17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL
18

19 INTERESTED PARTIES

20 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
21 Mortgage, LLC, its successors and/or assigns, hereby requests special notice of all events relevant
22 to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the
23 above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
24 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
25 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
26 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
27 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
28 above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3
4 EDDIE R. JIMENEZ
PITE DUNCAN, LLP
4375 Jutland Drive
5 Suite 200
6 San Diego, CA 92117

7 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
8 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
9 waiver of the within party's:

10 a. Right to have any and all final orders in any and all non-core matters entered only
11 after de novo review by a United States District Court Judge;

12 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
13 whether or not the same be designated legal or private rights, or in any case, controversy or
14 proceeding related hereto, notwithstanding the designation or not of such matters as "core
15 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
16 to statute or the United States Constitution;

17 c. Right to have the reference of this matter withdrawn by the United States District
18 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

19 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
20 which this party is entitled under any agreements at law or in equity or under the United States
21 Constitution.

22 All of the above rights are expressly reserved and preserved by this party without
23 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
24 or by any other participation in these matters.

25 Dated: August 14, 2009

/s/ Eddie R. Jimenez
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Suite 200
San Diego, CA 92117
(702) 413-9692
NV Bar #10376
Attorney for GMAC MORTGAGE, LLC, its
28 successors and/or assigns

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on August 14, 2009.

Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Russell G. Koehnlein, Jr.
Christina M. Koehnlein
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Las Vegas, NV 89166

George Haines
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Las Vegas, NV 89101

Kathleen A. Leavitt
201 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89101

U.S. Trustee
Department of Justice
300 Las Vegas Boulevard, So.
Suite 4300
Las Vegas, NV 89101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 14, 2009, at San Diego, California.

/s/ Mary K. Arnold